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May 14, 2019

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, DC 20554

Re: *Ligado Network Subsidiary LLC, Amendment to License Modification Applications, IBFS File Nos. SAT-AMD-20180531-00045, SAT-AMD-20180531-00044, SES-AMD-20180531-00856; SES-MOD-20151231-00981, SAT-MOD-20151231-00090, and SAT-MOD-20151231-00091 (“the Modification Applications”); IB Docket Nos. 12-340, 11-109*

Dear Ms. Dortch:

Pursuant to Section 1.1206 of the Commission’s rules,¹ this letter provides notice that on May 10, 2019, Iridium Communications Inc. (Iridium), represented by Maureen C. McLaughlin, Vice President, Public Policy, and the undersigned met with Aaron Goldberger, Acting Wireless & International Advisor to Chairman Ajit Pai. During this meeting, Iridium discussed its latest business development plans, including the completion of Iridium® NEXT and the launch of the Iridium CertusSM service; and reiterated the topics covered by Iridium’s past filings regarding Ligado’s proposed terrestrial operations in the above referenced proceedings. The slides presented at the meeting are attached to this filing.

Please direct any questions concerning this submission to the undersigned.

Respectfully Submitted,

/s/ Bryan N. Tramont
Bryan N. Tramont
Counsel to Iridium Communications Inc.

Attachment

cc: Aaron Goldberger

¹ 47 C.F.R. § 1.1206.

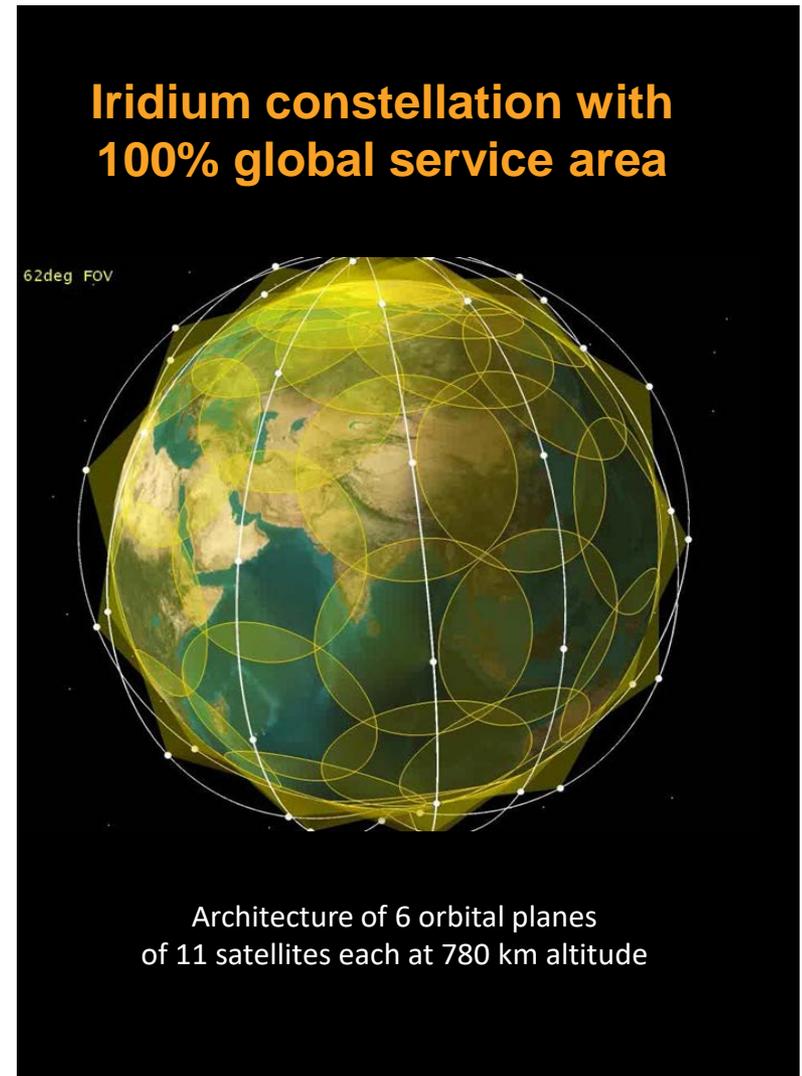


INTRODUCTION TO IRIDIUM COMMUNICATIONS

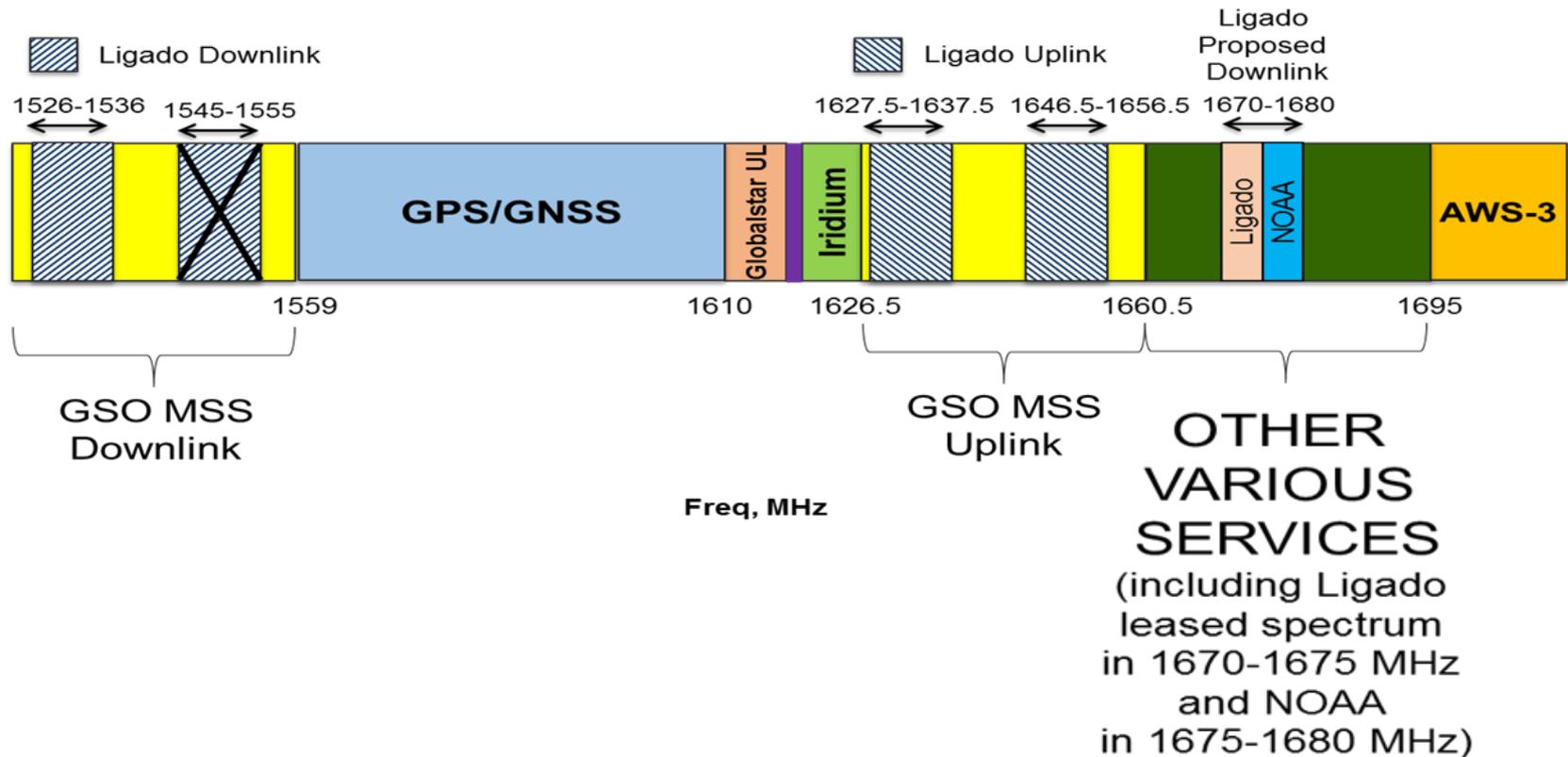
MAY 2019

A NEW ERA FOR GLOBAL CONNECTIVITY

- On **January 11, 2019**, a flight-proven SpaceX Falcon 9 rocket launched from Vandenberg Air Force Base and delivered the final 10 Iridium® NEXT satellites to low earth orbit (LEO)
- This was the **largest satellite constellation replacement ever**
- 66 cross-linked, low earth orbit (LEO) satellites
- Only **fully global** voice and data provider; approximately 1,121,000 subscribers
- Efficient operations using only 8.725 MHz of spectrum worldwide for uplink and downlink
- Messages are routed from satellite to satellite and grounded at teleports around the world



Iridium's L-Band Neighborhood



- Iridium currently licensed to operate in 1617.775-1626.5 MHz
- 8.725 MHz total spectrum to provide uplink and downlink service links



Harmful Interference to Iridium Services from Ligado's Proposed Terrestrial Operations Must Be Resolved

- Ligado Networks (formerly LightSquared) seeks to operate a modified terrestrial network operating in the L-band, including the 10 MHz adjacent to Iridium at 1627.5-1637.5 MHz
- Iridium's technical analysis (submitted to FCC on Sept. 1, 2016) and aviation-specific technical analysis (submitted to FCC on Dec. 14, 2016) indicates that this terrestrial operation on that 10 MHz of spectrum would result in significant harmful interference to Iridium's mobile terminals, including those used for vital SATCOM aviation services
- Ligado's May 2018 amendment does not address Iridium
- Section 25.255 of the FCC's rules requires Ligado to resolve any harmful interference from their terrestrial operations; purpose of the rule is clear – maximize flexibility consistent with sound spectrum management while providing absolute interference protection for incumbent MSS providers
- The burden is on Ligado to resolve Iridium's concerns; absent resolution, the FCC must not grant Ligado's application with respect to the spectrum at 1627.5-1637.5



BROAD OPPOSITION TO LIGADO PROPOSAL

“The [coalition] continues to have **serious unresolved concerns with Ligado’s proposed operations** ... The existing services provided by the GPS, SATCOM, aviation and real-time environmental satellite data communities, which depend upon interference-free operations in spectrum adjacent to or co-channel to spectrum central to Ligado’s plans, are too important to jeopardize, especially for the speculative benefits of Ligado’s constantly evolving proposals, details of which continue to be lacking.”

July 18, 2018 ex parte letter of Coalition of Aviation, SATCOM, and Weather Information Users

- *AccuWeather*
- *Aviation Spectrum Resources, Inc.*
- *Aerospace Industries Association*
- *DTN (formerly Schneider Electric)*
- *Aircraft Owners and Pilots Association*
- *General Aviation Manufacturers Association*
- *Airlines for America*
- *Gogo Business Aviation*
- *ALERT Users Group*
- *Helicopter Association International*
- *American Geophysical Union*
- *International Air Transport Association*
- *American Weather and Climate Industry Association*
- *Iridium Communications, Inc.*
- *American Meteorological Society*
- *Lockheed Martin*
- *Microcom Design, Inc.*
- *Rockwell Collins Inc.*
- *Narayan Strategy*
- *Satelles Inc.*
- *National Air Transportation Association*
- *National Hydrologic Warning Council*
- *National Weather Association*
- *Resilient Navigation & Timing Foundation*
- *National Emergency Number Association*
- *University of Wisconsin, Space Science and Engineering Center*



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